

**John R. Barhoum, OSB No. 045150**

Email: john.barhoum@chockbarhoum.com

**Jeffrey W. Hansen, OSB No. 923290**

Email: jeff.hansen@chockbarhoum.com

Chock Barhoum LLP

121 SW Morrison St., Suite 500

Portland, OR 97204

Telephone: 503.223.3000

Facsimile: 503.943.3321

Attorneys for Defendants City of Saint Helens and  
Adam Raethke

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

ROBERT BARROR,

Case No. 3:20-cv-00731-SB

Plaintiff,

v.

CITY OF SAINT HELENS, and ADAM  
RAETHKE, in his individual capacity,

Defendants.

**DECLARATION OF SERGEANT EVIN  
EUSTICE IN SUPPORT OF  
DEFENDANTS' MOTION FOR  
SUMMARY JUDGMENT**

I, Evin Eustice, declare as follows:

1. I am a Sergeant for the St. Helens Police Department. I was hired as a patrol officer with the St. Helens Police Department in August 2016, and was promoted to Sergeant in June 2018.

2. Officer Adam Raethke is one of the officers I supervise.

3. One of my roles as Sergeant is to ensure that officers under my command participate in trainings on a variety of topics, and that the officers remain up to date with their training requirements.

4. St. Helens police officers are required, among other things, to participate in annual training related to the appropriate circumstances to use force when effectuating arrests.

5. I also participate in training the officers and have been involved in revising and/or updating St. Helens' use of force policies to accurately reflect changes or developments in the law.

6. Revising St. Helens' policies is a collaborative process. In addition to working within the Department to develop an effective policy, the Department also takes recommendations from Lexipol (an independent organization that specializes in developing state-specific policies and trainings for police officers) and from the Police Executive Research Forum (PERF).

7. Attached as Exhibit 5 is a true and accurate copy of St. Helens' Use of Force Policy that was in place at the time that the incident giving rise to this lawsuit occurred.

**I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE UNITED STATES THAT THE FOREGOING IS TRUE AND ACCURATE.**

DATED this 8<sup>th</sup> day of November, 2022.

**CHOCK BARHOUM LLP**



---

Sgt. Evin Eustice